

Transcript of the Testimony of

WILLIAM WRIGHT, M.D.

June 7, 2019

Craig Shipp

v

Correct Care Solutions, LLC, et al.

Sundae A. Stoa, FCRR, RPR

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<p style="text-align: right;">Page 21</p> <p>1 Q. Okay. You can pass that back. 2 And I do understand the confusion that you 3 were talking about about the shoes. 4 They had a property form; is that right? 5 A. Yeah. 6 Q. Okay. Do you want to see Mr. Shipp's 7 testimony, as well? 8 Let's see. Craig Shipp? Here it is. 9 And I'm referring to Page 32 and 33, and I'm 10 going to mark Page 32, Line 13 down to Page 34, Line 3. 11 And I'm sorry it's small. 12 A. Okay, yes. 13 Q. So do you understand now that he 14 actually -- the shoes were not taken with him to 15 SWACCC? 16 A. Yes, that's correct. 17 Q. All right. Thank you. 18 The property forms -- 19 MS. ODUM: Rosalyn, are you going to get into 20 that property at intake? 21 MS. MIDDLETON: No, I hadn't planned on it. 22 No, Michelle. 23 MS. ODUM: Okay. I just didn't want to step 24 on your toes. 25 MS. MIDDLETON: Huh-uh.</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. Okay. But one is not a big deal and one is a 2 bigger deal? 3 A. Well, there are all sorts of degrees of 4 severity with debridement, yeah. 5 Q. Okay. Well, if I have an ulcer on my heel 6 because I wore bad shoes, and it breaks open and it's 7 hanging by skin, would it be preferable for me to cut 8 it rather than pull it off? 9 A. If it's protecting the skin underneath, you 10 would probably leave it in place. 11 Q. Okay. But if it's just hanging by a little 12 piece of skin? 13 A. Then you would probably take it off. 14 Q. Okay. Now, is that considered a serious 15 debridement or is that considered a minor debridement? 16 A. Well, I consider it a minor debridement. 17 Q. Okay. Now, do you recall that the record 18 said that the skin was attached only by the corner? 19 A. I don't recall. I believe that on -- at that 20 time, there was no notation about the details of the 21 debridement. 22 Q. All right. I'm going to hand you -- it's 23 People's Exhibit 35, but it's the February 5th, 2016 24 encounter with Nurse Smith. 25 And in the second line it discusses the left</p>
<p style="text-align: right;">Page 22</p> <p>1 Q. (BY MS. ODUM) I'm curious, you said his New 2 Balance shoes were placed in property for holding? 3 A. That was my impression from the intake exam. 4 Q. Okay. So you didn't notice one that said 5 keep in possession? 6 A. Keep in possession -- that's why I thought 7 there were three pairs that we were talking about. 8 Q. Okay. Now, then you move down to your 9 February 5th, 2016 notation? 10 A. Yes. 11 Q. Now, you used the word "debridement" -- a 12 debridement of the left foot was done by the unit M.D.? 13 A. Yes. 14 Q. All right. Now, I understand "debridement" 15 probably can mean just removal of dead skin; is that 16 right? 17 A. That's correct. 18 Q. Okay. So if I have an ulcer on my heel and 19 it breaks loose and it's hanging, if I snip it, I've 20 debrided my heel? 21 A. That's right. 22 Q. All right. Now, there is also a surgical 23 debridement; is that -- is that accurate? 24 A. Well, they would both be considered surgical 25 debridements.</p>	<p style="text-align: right;">Page 24</p> <p>1 foot with an open area: Skin only attached at the 2 corner? 3 A. Yes, ma'am. 4 Q. Okay. And the next sentence, it says: Unit 5 M.D. here -- skin was removed by M.D.? 6 A. Yes, ma'am. 7 Q. Okay. Now, did you read Dr. Lemdja's 8 deposition testimony? 9 A. Yes. 10 Q. Okay. And did you see where she said she 11 just snipped hanging skin? 12 A. Well, she had said about debridements in 13 general -- that she considered that a big procedure. 14 Q. Okay. 15 A. And since she didn't make any notes about it, 16 it was really impossible to say. 17 Q. All right. And I think I'm going to point 18 the reference that you just made -- on Page 17 of 19 Dr. Lemdja's deposition, it was asked if -- the 20 question was: What if it's not, you know, a surgical 21 procedure, but just -- kind of just, you know, a 22 topical procedure as far as, you know, a kind of 23 debridement of a wound perhaps? 24 And she answered: Debridement of a wound? 25 Question: Yes.</p>

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